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August 3, 2018 Via ECF John P. Amato Partner 212.478.7380 jamato@hahnhessen.com

Honorable Alan S. Trust United States Bankruptcy Judge Eastern District of New York Alfonse M. D'Amato Federal Courthouse 290 Federal Plaza Central Islip, New York 11722

Re: Orion Healthcorp, Inc., et al. v. Parmar, et al., Adv. Pro. No. 18-08053

(In re Orion Healthcorp, Inc. et al., Case No. 18-71748 (Jointly

Administered)

## Dear Judge Trust:

On behalf of the debtors and debtors in possession in the above-referenced chapter 11 cases, and plaintiffs in the above-captioned adversary proceeding (collectively, the "<u>Debtors</u>"), we write to request that the Clerk of the Court issue an alias summons in *Orion Healthcorp, Inc.* vs. Parmar, et al., Adv. Pro. No. 18-08053 in order that the Debtors can effect additional timely service of the amended complaint upon defendant Pavandeep Bakhshi.<sup>1</sup>

Pursuant to Bankruptcy Rule 7004(e) a summons needs to be mailed within seven (7) days of issuance. The amended summons in this case was issued on June 6, 2018. Additionally, in the amended complaint, defendant Pavandeep Bakhshi is incorrectly identified as "Pavan Bakshi". Accordingly, we request that the alias summons reflect the correct spelling of the defendant's name, "Pavandeep Bakhshi".

Respectfully submitted,

/s/ John P. Amato

John P. Amato

cc: Counsel of Record (via ECF)

<sup>1</sup> The Debtors believe that service of process has already been properly effected, however the Debtors are undertaking additional service solely to moot out the service of process argument articulated in Bakhshi's motion to dismiss.